

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE INTERROGATORIES  
TO AMERICAN POSTAL WORKERS UNION WITNESS KACHA (APWU-RT-3)  
USPS/APWU-RT3-26 AND USPS/APWU-RT3-27**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service respectfully submits the following interrogatories and requests for production of documents to American Postal Workers Union witness Pierre Kacha: USPS/APWU-RT3-26 and 27.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**USPS/APWU-RT3-26**

Figure 1 on page 4 of APWU-RT-3 shows Inter-SCF Overnight mail service performance as decidedly lower than "Intra-SCF Turnaround" mail. What is the basis for this assumption?

**USPS/APWU-RT3-27**

- (a) How is Standard Mail treated in your model?
- (b) Does your model keep standard mail performance constant?